

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
Plaintiff,)	CASE NO. 05CR10224-GAO-1
)	
v.)	
)	
J.C. ANDERSON,)	
Defendant.)	
)	

**AFFIDAVIT OF ATTORNEY JESSICA HEDGES IN SUPPORT OF
DEFENDANT J.C. ANDERSON'S MOTION TO ALLOW INDEPENDENT EXPERT
VIEW DRUGS**

I, Jessica D. Hedges, being duly sworn hereby depose and state as follows:

1. I am the law partner to Stephen Hrones, the attorney who has been CJA-appointed to represent the defendant in the above-captioned case.

2. My practice has concentrated on criminal and civil rights litigation.

3. On August 24, 2005, the defendant was indicted on one count of conspiracy to distribute a cocaine base (21 U.S.C. § 846), two counts of distribution of a cocaine base (21 U.S.C. § 841(a)(1)), and held subject to criminal forfeiture to (21 U.S.C. § 853).

4. In my opinion, a drug analysis expert is necessary to assure the defendant as effective a defense as possible.

5. I base this opinion, in part, on the significant potential sentence which the defendant faces if convicted and the specialized expertise needed to determine the actual weight of the drugs.

6. Counsel for defendant has conferred with the Agent in this matter, Agent Robert White, who has indicated that the drugs are in the possession of the Brockton Police Department. Agent White indicated that he would ensure that the drugs were made available to defendant, but

that the State Laboratory needs an order from this court allowing them to permit an independent chemist examine the drugs.

7. I have spoken with the Assistant United States Attorney assigned to this matter, and she has no objection to this motion.

SIGNED AND SWORN TO UNDER THE PAINS AND PENALTIES OF PERJURY,
THIS 11th DAY OF April, 2006, BOSTON, SUFFOLK COUNTY,
MASSACHUSETTS.

//S// Jessica D. Hedges
Jessica D. Hedges (BBO No. 645847)
Hrones, Garrity & Hedges
Lewis Wharf - Bay 232
Boston, MA 02110
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CERTIFICATE OF SERVICE

I, Jessica Hedges certify that, on this the 11th day of April, 2006, I caused to be served a copy of this document, where unable to do so electronically, on all counsel of record in this matter.

//S// Jessica D. Hedges
Jessica D. Hedges